

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF WASHINGTON

UNITED STATES OF AMERICA,

Case No.: 2:24-CR-0008-TOR-2

Plaintiff,

## PROTECTIVE ORDER

V.

BETH ANN HAYES,

Defendant.

The United States of America, having applied to this Court for a Protective Order regulating disclosure of the discovery materials and the sensitive information contained therein to defense counsel in connection with the Government's discovery obligations, and the Court finding good cause therefore, **IT IS HEREBY**

**ORDERED:**

1. The United States' Unopposed Motion for Protective Order Regulating Disclosure of Discovery and Sensitive Information is **GRANTED**.

2. The United States is authorized to disclose the discovery including sensitive information and materials (hereinafter “Discovery”) in its possession pursuant to the discovery obligations imposed by this Court.

1       3.     Government personnel and counsel for Beth Ann Hayes (“Defendant”),  
2 shall not provide, or make available, the sensitive information in the Discovery to  
3 any person except as specified in the Order or by approval from this Court. Counsel  
4 for Defendant and the Government shall restrict access to the Discovery, and shall  
5 only disclose the sensitive information in the Discovery to their client, office staff,  
6 investigators, independent paralegals, necessary third-party vendors, consultants,  
7 and/or anticipated fact or expert witnesses to the extent that defense counsel believes  
8 is necessary to assist in the defense of their client in this matter or that the  
9 Government believes is necessary in the investigation and prosecution of this matter.  
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12       4.     Third parties contracted by the United States or counsel for Defendant  
13 to provide expert analysis or testimony may possess and inspect the sensitive  
14 information in the Discovery, but only as necessary to perform their case-related  
15 duties or responsibilities in this matter. At all times, third parties shall be subject to  
16 the terms of the Order.  
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19       5.     Discovery in this matter will be available to defense counsel via access  
20 to a case file on USA File Exchange. Counsel for Defense may download Discovery  
21 from USA File Exchange and shall exercise reasonable care in ensuring the security  
22 and confidentiality of the Discovery by electronically storing the Discovery on a  
23 password-protected or encrypted storage medium, including a password-protected  
24 computer, or device. If Discovery is printed, Counsel must also exercise reasonable  
25 care in ensuring the security and confidentiality of the Discovery by storing copies  
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1 in a secure place, such as a locked office, or otherwise secure facility where visitors  
2 are not left unescorted  
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4       6. All counsel of record in this matter, including counsel for the United  
5 States, shall ensure that any party, including the Defendant, that obtains access to  
6 the Discovery is advised of this Order and that all information must be held in strict  
7 confidence and that the recipient may not further disclose or disseminate the  
8 information. Any other party that obtains access to, or possession of, the Discovery  
9 containing discovery information once the other party no longer requires access to  
10 or possession of such Discovery shall promptly destroy or return the Discovery once  
11 access to Discovery is no longer necessary. No other party that obtains access to or  
12 possession of the Discovery containing sensitive information shall retain such access  
13 to or possession of the Discovery containing sensitive information unless authorized  
14 by this Order, nor further disseminate such Discovery expect as authorized by this  
15 Order or the further Order of this court. For purposes of this Order, “other party” is  
16 any person other than appointed counsel for the United States or counsel for  
17 Defendant.  
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22       7. All counsel of record, including counsel for the United States, shall  
23 keep a list of the identity of each person to whom the Discovery containing sensitive  
24 information is disclosed. Neither counsel for Defendant nor counsel for the United  
25 States shall be required to disclose this list of persons unless ordered to do so by the  
26 Court.  
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8. Upon entry of a final order of the Court in this matter and conclusion of any direct appeals, government personnel and counsel for Defendant shall retrieve and destroy all copies of the Discovery containing sensitive information, except that counsel and government personnel may maintain copies in their closed files following their customary procedures.

9. Government personnel and counsel for Defendant shall promptly report to the Court any known violations of this Order.

**IT IS SO ORDERED.** The District Court Clerk is hereby directed to enter this Order and provide copies to counsel.

**DATED** this 24th day of July 2024.



THOMAS O. RICE  
United States District Judge